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August 22, 2023

VIA ECF AND EMAIL

The Honorable Analisa Torres
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: Proskauer Rose LLP v. O'Brien, No. 1:22-CV-10918-AT (S.D.N.Y.)

Dear Judge Torres,

We represent Defendant Jonathan O'Brien ("Mr. O'Brien") in the above-referenced case, and we submit this letter on behalf of both parties. In order to accommodate competing obligations on both sides, the parties respectfully request a brief extension of two specific deadlines in this case as follows:

- The current deadline for Mr. O'Brien to file his Answer or otherwise respond to the Amended Complaint is August 28, 2023 [ECF No. 99]. The parties request to adjourn this deadline by three weeks, to September 18, 2023.
- The current deadline for Plaintiff Proskauer Rose LLP to respond to Mr. O'Brien's interrogatory requiring identification of trade secrets (§ 6(b)(i), Dkt. 85) is September 28, 2023 [ECF No. 99]. The parties request to adjourn this deadline by three weeks, to October 19, 2023.



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The parties are not seeking an extension of any other deadlines at this time. The parties have previously requested only one other extension for these two specific deadlines, except that the parties submitted a revised Case Management Order affecting all deadlines in the case, which was allowed on July 3, 2023 following the expiration of a temporary stay [ECF No. 97].

We appreciate the Court's consideration of, and attention to, this matter.

Respectfully submitted,
BECK REED RIDEN, LLP

/s/ Russell Beck
Russell Beck

cc: Counsel of Record (via ECF)